

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

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WINFORD DALLAS JONES, ) Civil Action No.  
 ) 7:06-CV-00547  
Plaintiff, )  
 )  
v. )  
 )  
C.H. ROBINSON WORLDWIDE, INC.; )  
and C.H. ROBINSON COMPANY; and )  
C.H. ROBINSON COMPANY, INC.; )  
and C.H. ROBINSON COMPANY, )  
L.P.; and C.H. ROBINSON )  
INTERNATIONAL, INC.; and C.H. )  
ROBINSON OPERATING COMPANY, )  
L.P.; and C.H. ROBINSON )  
TRANSPORTATION COMPANY, INC., )  
 )  
Defendants.)

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VOLUME II, pages 105-214  
30(b)(6) DEPOSITION OF: Bruce W. Johnson  
TAKEN AT: C.H. Robinson Worldwide, Incorporated  
14701 Charlson Road  
Eden Prairie, Minnesota  
DATE: March 13, 2008  
COMMENCING AT: 9:06 a.m.

Reported by: Patrick J. Mahon  
Registered Merit Reporter  
Certified Realtime Reporter  
Job No. 4932



1 APPEARANCES:

2 For the Plaintiff:

3 Timothy E. Kirtner  
4 Gilmer, Sadler, Ingram, Sutherland & Hutton, L.L.P.  
5 65 East Main Street  
6 Pulaski, Virginia 24301-0878  
7 540-980-1360

8 For the Defendants:

9 Paul C. Kuhnel  
10 Wooten Hart, PLC  
11 Suite 300, 707 Building  
12 707 South Jefferson Street  
13 Roanoke, Virginia 24016  
14 540-343-2451  
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1 Q. Is there a particular reason that as of today 75  
2 percent of C.H. Robinson's contract carriers consist of  
3 small carriers?

4 A. I'm sure there is, but I'd probably be somewhat  
5 speculating as to why.

6 Q. Well, subject to Mr. Kuhnel's objection, which  
7 he's about to make, I'm going to ask you to go ahead and  
8 answer that question.

9 MR. KUHNEL: Well, I'll object to the form  
10 of the question to the extent it calls for speculation.  
11 You can answer, if you're able to.

12 A. A lot of those things we talked about as to what  
13 we market, I mean, that's important, those things are  
14 important to small carriers.

15 BY MR. KIRTNER:

16 Q. Okay. Cash flow issues are important to small  
17 carriers, correct?

18 A. For the most part, correct.

19 Q. And working with C.H. Robinson because of Quick  
20 Pay and T-Chek helps small carriers to keep the wheels  
21 rolling; is that correct?

22 A. Correct.

23 Q. Do you have any sense of -- strike that.

24 Do you have any ability to break that down any more  
25 narrowly? Specifically, what about carriers with less

1 than 10 tractors, do you know what those numbers look  
2 like?

3 A. I don't know.

4 Q. Could you estimate that?

5 A. I wouldn't want to without further research.

6 Q. Okay. Do you have the ability to research that?

7 A. Yes.

8 Q. Understanding that you don't know how many of the  
9 carriers who are in C.H. Robinson's contract carrier  
10 program have less than 10 tractors, would it be your  
11 experience that carriers who have fewer than 10 tractors  
12 are more frequently in need of the Quick Pay and T-Chek  
13 services?

14 A. Yes.

15 Q. Do you know how many tractors AKJ Enterprises  
16 had?

17 A. Not off the top of my head.

18 MR. KIRTNER: Can we get this document  
19 marked as Exhibit 12?

20 (Ex. 12 was marked for identification.)

21 BY MR. KIRTNER:

22 Q. When we were here the last time, I think where we  
23 left off is, you were beginning to talk something about  
24 SafeStat and how C.H. Robinson is dealing with SafeStat.

25 A. Correct.